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By email: aviationwhitepaper@infrastructure.gov.au

For the attention of the Aviation White Paper Branch - Domestic Aviation & Reform Division

Aviation White Paper – Initial Submissions

The Civil Air Operations Officers Association of Australia (“Civil Air”) is a registered organisation under the *Fair Work Act (Registered Organisations) Act 2009*. Civil Air was established in 1948 and the Association has eligibility to represent members employed in civilian air traffic control and air traffic services in Airservices Australia. Civil Air directly represents over 90% of employees eligible to be members of the Union.

Australia has is one of the safest aviation environments in the world. Our air traffic control (ATC) system significantly contributes to this estimable reputation and air traffic control officers (ATCOs) play a critical role by ensuring the safe, orderly, and expeditious flow of air traffic.

Civil Air appreciates the opportunity to make a submission during this initial round of consultation for the Aviation White Paper. Our membership has an intimate and enduring relationship with the Australian aviation sector, performing a key role in the daily operations of the industry, whilst maintaining regulatory and professional standards of safety and efficiency.

Our submission is framed around key themes drawn from the Terms of Reference that are applicable to our Association and our membership.

Most of our members are employees of Airservices Australia (“Airservices”), the Commonwealth statutory agency responsible for the provision of air navigation services in Australia (and surrounding territory). As such, our submissions relate largely to the operations of Airservices.

We would like to make clear that whilst we are a registered industrial organisation, our position as outlined in this submission, should be read through the prism of our role as a professional association. Our submission is intended to be constructive and to assist the Government in their consultation.

Future Industry Workforce Skills and Training

Air Traffic Management Workforce Planning

People are the foundation of the aviation industry. Unfortunately, commercial pressures caused by economic or industry downturns (which occur on a cyclical basis) often cause reductions in workforce capability to be used as a financial “relief valve.” This may be a practical approach for private businesses however, in our view, it is inappropriate in an organisation providing a public service, such as Airservices. Yet, staff reductions have been increasingly used by Airservices to cut costs (“Accelerate” redundancy program 2016, Corporate Redundancy Program 2021 and Retirement Incentive Scheme 2021/2022).

Civil Air – The Australian Air Traffic Control Association



It is notable that Airservices have committed to keeping their prices low and to this end, they last increased their prices on 1 July 2015. The Airservices Corporate Plan 2022-2023 states that they have,

“... therefore delivered a 17% price reduction in real terms as at 2021-22. The plan assumes price increases in line with inflation from 2023-24 onwards, as we see successful industry recovery and align our cost base and services to match the new industry demand. We will deliver a further 4% real price reduction to customers through to 2026-27 for our current services, reflecting a realignment of our underlying cost base to match a 15% reduction in traffic assumptions compared to our pre COVID-19 plan.”

However, as a safety and service based statutory organisation providing air navigation services, ultimately a reduction of staffing resources has direct negative consequences for service delivery, including increased delays to industry. When accounting for modern air traffic flow management pre-tactical principles (refer ICAO doc 4444 chapter 3), this effect includes the cancellation of flights. This consequently has enormous negative economic impacts on Airlines, and flow on losses of productivity across the wider Australian economy.

Airservices provides a Long-Term Pricing Agreement to enable industry to have certainty about their aviation charges. It is our strong view that the financial savings achieved through a reduction in staff resourcing are enormously outweighed by heightened operational costs due to the previously mentioned operational restrictions. These costs include increased fuel burn, due to airborne delays or holding, increased compensation to customers in the event of flight cancellations, increased crewing costs due to crew duty limits being exceeded, often due to unexpected delays, and a loss of goodwill from customers due to what they perceive to be operator caused delays.

There are also significant levels of productivity loss, albeit difficult to quantify, caused by lost time of business travellers in transit and worrying levels of damage to the tourism industry because of flight delays or disruptions to holiday destinations.

It is our submission that workforce resourcing in the Air Traffic Management sector should be fixed by regulation to ensure a minor surplus of staff always exists, to ensure that no negative economic consequences occur because of ATC staff shortages. Civil Aviation Safety Regulations Part 172.110 and 172.115 regulate ATC staffing. At a minimum, we submit that CASA proposed amendments to CASR Part 172 are implemented swiftly to ensure that any ANSP consider all appropriate factors in determining minimum staffing, including leave, training, supervision, and other professional development.

Workforce Diversity and Inclusion

Civil Air has a steadfast commitment to promoting diversity and inclusivity principles in the recruitment and retention of staff. The data suggests that women, LGBTQI+ individuals, CALD and First Nations people (reported in Airservices Annual Reports as Aboriginal and Torres Strait Islander) are all significantly under-represented in air traffic service staff numbers.

The attraction and retention of women, First Nations people and CALD groups is specifically reported by Airservices and concerningly, the numbers of employees in these groups in ATC has remained stubbornly low over decades.

We submit that a level of inquiry needs to occur about why the composition of Airservices Air Traffic Service workforce has remained so static and unrepresentative of the broader society.

Maintaining Fit-For-Purpose Aviation Safety and Air Navigation Systems, and Service Delivery Agencies

Air Traffic Management Workforce Capability

Please refer to our earlier comments under the *Future Industry Workforce Skills and Training* heading regarding Air Navigation Service Provider workforce resourcing. In our view, the training and retention of appropriately trained Air Traffic Controllers is the biggest challenge facing the Air Traffic Management industry throughout the current decade at least, and likely into future decades.

The onset and subsequent workforce effects of the Covid-19 pandemic have proved that a well-trained workforce is a precious and hard to replace resource. The Aviation sector has been particularly vulnerable in economic recovery, due to the very specific skillsets and training that is required across the industry.

An enormous amount of experience and resilience has been lost across the sector, and whilst this White Paper will address the short, medium and long term plans to recover from that loss, we submit that a major area of focus must be ensuring that this loss of experience never occurs again. Robust policies should be put in place to ensure a forward-thinking perspective during future economic events, to avoid stifling subsequent industry recovery.

Co-Location of Terminal Control Units

A Terminal Control Unit (TCU) controls airspace within a defined radius of a major airport. For example, Sydney TCU is charged with airspace within 45nm of Sydney's Kingsford Smith Airport, up to 28000 feet. Within this area, not only do regular public transport operations occur, but numerous training flights, military activities, police operations, rescue helicopter operations, and other general aviation operations all take place daily.

It is our position that a TCU is best co-located in the same city that it serves. Local knowledge possessed by ATCs provides better outcomes for efficiency, including increased understanding and sensitivity about aircraft noise abatement; as well as improved abilities to handle emergency operations, with familiarity with local geography exponentially greater than someone who has never lived under the airspace they control. The ability to identify and communicate geographic features has obvious benefits to a controller who is required to assist, for example, a lost aircraft, an aircraft subject to an impending forced landing, or to a rescue helicopter that is required to land on a suburban park or road.

Furthermore, in-situ TCUs allow for highly effective professional relationships to be forged between TCU staff and local industry operators (including general aviation operators). This relationship leads to a shared understanding of day-to-day operations, improved planning and efficiency of flights, and a general fostering and improvement of the conduct of the general aviation industry.

Enabling Benefits of OneSKY

The Civil Military Air Traffic Management System (CMATS), more commonly known as OneSKY, is the greatest change in the Australian Air Traffic Management sector this century. The project aims to not only provide greater assistance to Air Traffic Controllers to complete their work but is planned to deliver significant financial benefits to industry through improved efficiency of flight operations, and a significant improvement in the ability to forecast and plan required staff resources on a tactical basis.

The forecast benefits to industry are contingent on the sound implementation of the OneSKY platform. This

includes a technical rollout, but also a significant amount of training for Air Traffic Controllers, Supervisors, and other supporting staff, to be able to properly utilise this new system. Our understanding is that a training plan for this system transition, at least for civil Air Traffic Controllers, is still being designed by Airservices.

Civil Air submits that it is in the mutual interests of the entire industry to ensure that the Air Traffic Management workforce is thoroughly trained to maintain the maximum possible benefit is obtained from OneSKY. Whilst the system provides a vast array of new tools and features that will improve both efficiency and safety of flights, these benefits will not be realised if staff training is conducted in a rushed or inadequate way. We believe that full and comprehensive training, including practical simulation, will be required to properly prepare all staff for use of the new system.

Further, it is our firm view that the Air Traffic Management workforce should be sufficiently sized for a “bow wave” of staff to exist, reducing the risk of pressures being placed upon the training schedule.

Other Issues

Professional Consultation and Collaboration

Civil Air works closely with Airservices on professional issues that affect our members. Amongst other avenues, this professional relationship is continued through the quarterly meeting of a *Professional and Technical Committee*, established through our Enterprise Agreement, which comprises Airservices management (including safety representatives) and Civil Air’s elected officials.

This Committee proves a valuable resource for Civil Air to openly canvas and discuss safety concerns, and in turn proves useful to Airservices through enabling early and effective engagement on safety-related changes, including on project work.

We submit that the existence of such a committee should be non-negotiable for any safety based (or regulated) organisation in the industry, and as such, the Government should make it a compulsory body for all employers who hold an Operator’s Certificate (whether an ANSP, Airline, or other CASA regulated business).

Future Submissions

Civil Air intends to remain actively engaged in the White Paper process. We would be grateful for the opportunity to make further submissions when an appropriate opportunity arises.

Should the Government wish to obtain any further information about the work of our members, we would welcome direct contact via civilair@civilair.asn.au, tom.mcrobert@civilair.asn.au or 0407 689 387.

Yours faithfully,



Tom McRobert
President